

## **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**SITE JAB**

*Plaintiff,*

**v.**

**HISCOX INSURANCE COMPANY INC.**

*Defendant.*

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**C.A. NO. 4:23-CV-3853**

**AFFIDAVIT OF EVA GARCIA**

Before me, the undersigned authority, on this day personally appeared Eva Garcia, who upon her oath stated as follows:

1. My name is EVA GARCIA. I am over the age of 18, of sound mind, and capable of making this affidavit.
2. I am the custodian of records who signed the business records affidavit served to Defendant and I have personal knowledge of the documents, facts, happenings, etc. contained in the 73 pages of business records that were produced to Defendant.
3. I stated in an email (DOC 14-1 p. 71), "one of the employees we are suing may cooperate on our behalf because it was on her laptop which of all the messages were discovered...." The laptop on which the text messages were discovered was a SiteJab work computer.
4. It is in our regular course of business that we pull information from our work computers and save that information in our files.
5. The text messages that were produced to Defendant were found on one of our work laptops, were between people who were, at the time, current SiteJab employees, and were saved as personnel information in our files.

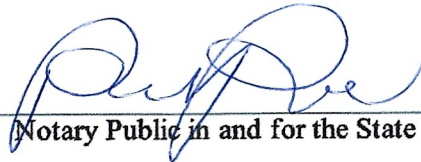
FURTHER AFFIANT SAYETH NOT.

SIGNED the 25<sup>th</sup> day of November 2024.



Eva Garcia

Signed and sworn to before me, the undersigned authority, on this 25<sup>th</sup> day of November 2024, to certify which witness my hand and seal of office.



Notary Public in and for the State of Texas

